

REMARKS

Claims 48-76 are currently pending in the application. Applicant respectfully requests reconsideration of the pending claims in view of the following remarks.

Claim Rejections – 35 U.S.C. § 102

Claim 76 stands rejected under 35 U.S.C. § 102(e) as being anticipated by Goeller et al. (US Pat. Appl. Publ. No. 2002/0178112). However, in view of the arguments presented herein, Applicants traverse the rejection and request that the rejection be reconsidered and withdrawn.

Goeller et al. do not teach or suggest all of the steps of the claimed method, including the step of "retrieving a consumer key based on at least a portion of the transactional debit data, the consumer key linking debit data from a plurality of data sources." Among other deficiencies, Goeller et al. do not teach or suggest a "consumer key" such as that disclosed and claimed in the present application. Instead, Goeller et al. simply refer to the idea that additional, "optional," customer information can be collected and entered into the point of sale device. Goeller et al. at para. 0056.

The consumer key as disclosed in the present application comprises data that is linked together into a unique identifier for a particular customer in a manner that represents a relatively permanent relationship. See, e.g., page 33, line 21 through page 34, line 7 of the originally-filed disclosure. The consumer key is a unitary string or number, e.g. in one embodiment thirteen bytes in length, which in general cannot be broken. See, e.g., page 35, line 21 through page 36, line 10 of the originally-filed disclosure. The consumer key is then sent to the debit data warehouse and used to locate debit data linked to the consumer key, which is subjected to further processing. See, e.g., page 38, line 19 through page 39, line 2 of the originally-filed disclosure.

Goeller et al. do not disclose the consumer key as described. The system described by Goeller et al. simply collects various consumer data and performs a simple matching procedure based on that data, but does not teach or suggest a method that includes "retrieving a consumer key based on at least a portion of the transactional debit data, the consumer key linking debit data from a plurality of data sources."

Thus, for at least these reasons, Goeller et al. do not anticipate claim 76.

Claim Rejections – 35 U.S.C. § 103

Claims 48-75 stand rejected under 35 U.S.C. § 103(a) as being obvious over a combination of Goeller et al. in view of Brown et al. (US Patent 6,026,398). However, in view of the arguments presented herein, Applicants traverse the rejection and request that the rejection be reconsidered and withdrawn.

Brown et al. fail to supply the deficiencies of Goeller et al. and thus the combination of references does not render obvious claims 48-75. As discussed above for claim 76, Goeller et al. do not teach or suggest a method that includes the step of "retrieving a consumer key based on at least a portion of the transactional debit data, the consumer key linking debit data from a plurality of data sources" because, among other deficiencies, Goeller et al. do not teach or suggest a "consumer key" such as that disclosed and claimed in the present application. For at least the reasons given above, Goeller et al. do not teach or suggest "a debit data search engine including a keying module and a matching module, wherein the debit data search engine is configured to receive the transactional debit data from the calling application, and process the transactional debit data to identify a consumer key," as recited in claim 48.

Brown et al. teach methods for searching and matching databases in which the input search data is broken into elements and the individual elements are simplified to one of a limited set of terms that are used for searching, so that the searches can produce results that do not exactly match the input search data. See Brown et al. at Abstract.

In contrast, the keying module of the debit data search engine, which processes transactional data to identify a consumer key, as recited in claim 48, uses a more stringent standard than used for the matching process. See, e.g., page 33, line 21 through page 34, line 7 of the originally-filed disclosure. This is done to avoid creating an incorrect consumer key, because once debit data is linked together to form a consumer key, the permanency of the consumer key is difficult to overturn. Further, while the method of Brown et al. involves breaking the input search data into elements, the consumer key that is identified by the keying module of the debit data search engine is difficult to break. See, e.g., page 35, line 21 through page 36, line 10 of the originally-filed disclosure.

Therefore, for at least these reasons Brown et al. also fail to teach or suggest "a debit data search engine including a keying module and a matching module, wherein the debit data search engine is configured to receive the transactional debit data from the calling application, and process the transactional debit data to identify a consumer key," as recited in claim 48.

Thus, because Brown et al. fails to supply the deficiencies of Goeller et al., claim 48 is not obvious over the combination of Goeller et al. in view of Brown et al.

The remaining dependent claims are allowable at least because each depends from the allowable independent claim 48, and because each recites additional patentable subject matter.

CONCLUSION

In view of the foregoing, allowance of the pending claims is respectfully requested. The undersigned is available for telephone consultation during normal business hours.

Respectfully submitted,

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